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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Missouri RSA No. 7 Limited Partnership dba Mid-Missouri Cellular ("MMC"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending September 30, 2001, detailing its efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help it attain that goal.

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² MMC now files this instant report with the Commission.

I. Carrier Background

MMC provides analog and digital CMRS wireless service in the Missouri 7 - Sedalia RSA.³ MMC intends to do everything within its power to comply with the requirements of 20.18(c) of the rules, to provide hearing-impaired persons with TTY access via the 911 dialing code over its digital wireless network. However, the ability for TTY devices to actually transmit calls over the TDMA digital portion of MMC's network is wholly dependent upon the availability of the required infrastructure hardware and software and compatible handsets in sufficient time to meet the Commission's deadline. MMC respectfully submits that these items are both beyond MMC's control. Accordingly, MMC has requested information and a status update from its network infrastructure and primary handset provider regarding their ability to meet the Commission deadlines.

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 Fcc Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Station KNKN595 (CMA510B) and KNKR207 (CMA024B-2).

II. Access to E911 Through TTY Devices

A. Development Activities

MMC utilizes analog AMPS and TDMA digital equipment provided by Nortel Networks (“Nortel”) for its wireless network infrastructure. In response MMC’s inquiry, Nortel has provided a status update on its progress in achieving full compliance with the Commission’s rules for the MMC infrastructure. Nortel’s response is appended hereto as **Exhibit A**. MMC is not independently capable of verifying the information presented below, but has no reason to believe that it is not accurate.

While MMC provides service to a number of brands of certified handsets owned by its subscribers and roamers entering its market, MMC’s primary handset provider for subscriber equipment sold by MMC is Nokia. MMC has requested that Nokia provide information on its progress in achieving full compliance with the Commission’s rules with its TDMA handsets. MMC has not yet received a response from Nokia, and therefore cannot report on their development activities. In the past, however, Nokia provided this information directly to the Commission in its own quarterly report. MMC presumes that Nokia will follow the same procedure for this quarter.

The appended Nortel information is respectfully submitted in response to these issues, as required in the Commission’s *Fourth Report and Order* (rel. Dec14, 2000).

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*
- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

B. Testing and Deployment Activities

Once equipment becomes available, MMC will perform the appropriate tests. The specific details of a time line to implement 911 access to TRS via TTY devices over the digital wireless network, and other issues related to such implementation, including handset development and testing, are tied to the technical specifications of the subscriber equipment that is being developed to provide TTY compatible service. As such, they are beyond the scope of information which MMC can provide. Such questions are more appropriately addressed by equipment vendors because the equipment vendors, and not the licensees, are directly involved in developing compliant equipment.

Because of the lack of available infrastructure hardware and software and compatibly handsets, MMC has yet to undertake any testing and development activities. However, Nortel’s response, appended to MMC’s 1st Quarterly Report, included some recommended testing procedures which, as of this point in time, MMC intends to follow once the requisite

infrastructure and subscriber hardware and software is available. The Nortel response addresses these issues, as set forth in the Commission's *Fourth Report and Order*.

- (7) *Carrier Coordination of Testing With PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*
- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

III. Conclusion

As soon as the issues surrounding TTY access over digital networks are resolved, and assuming they are completed in a timely manner, MMC intends to promptly and fully comply with the requirements of the *Fourth Report and Order*, to obtain all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices by December 31, 2001, and to integrate, test and deploy the technology in their systems in conjunction with the public safety community by June 30, 2002 but, respectfully submits, that its ability to do so, as of this point in time, remains entirely beyond its control. As required, MMC will provide the Commission with quarterly updates on the status of development and deployment, as advised by MMC's infrastructure and handset vendors and, if necessary, will seek a waiver of the applicable deadlines if the requisite equipment and software does not actually become available in sufficient time to enable MMC to meet the deadlines.

Respectfully Submitted,

Missouri RSA No. 7 Limited Partnership dba
Mid Missouri Cellular

October 15, 2001

/s/ Michael K. Kurtis

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It's Attorneys

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EXHIBIT A

Nortel's TDMA TTY Solution

Oct 8, 2001

Background:

FCC has mandated that wireless carriers provide E911 Emergency services to users with speech and hearing disabilities who communicate with TTY/TDD devices. The FCC deadline is for carriers to acquire solution hardware and software by December 31, 2001, and to offer service by June 30, 2002.

Nortel's TDMA TTY Solution

Nortel's TDMA TTY is supported on the DMS-MTX platform via MTX10 software release, which is scheduled to be channel ready on December 7, 2001.

TTY functionality is implemented in E-DSPM based TDMA wireless system and it is activated by enabling the TTY parameters in MTX10 software load.

Standards Compliance

Nortel's TDMA TTY solution is compliant to IS-823A and EIA-136-410 standard.

Status Update:

Nortel Networks has completed the development of the feature. Nortel has tested the feature using the available pre-production handsets from Panasonic and Motorola. Internal tests have achieved static/mobile TTY error rates of 1% (or less).

CERTIFICATE OF SERVICE

I, Carol A. Mindzak, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of October 2001, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a diskette copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, on this date, I have served copies of this Report via hand delivery or e-mail to the following:

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